

REMARKS

Claims 15-28 remain in the referenced application. Claims 1-14 have been canceled. Claim 15 has been amended.

Claims 15-18, 20-22, and 28 stand rejected under 35 U.S.C. §103(a) by Chesnut (U.S. Patent No. 4,823,556). Responsive thereto, Applicant has amended claim 15 to more clearly define the sensor units of the claimed invention. Particularly, claim 15 now recites monitoring sensor units positioned at different locations about the frozen cooling fluid bank. Applicant accordingly respectfully submits Chesnut does not render claims 15-18, 20-22, and 28 obvious because Chesnut does not disclose multiple sensor units positioned at different locations about a frozen cooling fluid bank.

Chesnut discloses an electronic ice bank control including probes 5-8, with the probe 6 being a ground probe. An alternating current supply 12 delivers current to the probes 5, 7, and 8, thereby permitting resistance measurements. The resistance between the probe 7 and the ground probe 6 and between the probe 8 and the ground probe 6 is variable, whereas the resistance between the probe 5 and the ground probe 6 is a fixed reference resistance representing a liquid reading. Consequently, the resistance between the probe 7 and the ground probe 6 and between the probe 8 and the ground probe 6 is measured and compared to the fixed reference resistance. A resistance substantially similar to the fixed reference resistance indicates liquid, and a resistance different from the fixed reference resistance indicates ice. When the resistance between the probe 8 and the ground probe 6 indicates a liquid, the electronic ice bank control activates a refrigeration system until the resistance between the probe 7 and the ground probe 6 indicates ice. The probe 8 resides interior to the probe 7 and, along with the probes 5 and 6, provides an indication of when the ice bank reaches a low level requiring the activation of the refrigeration system. The probe 7 resides exterior to the probe 8 and, along with the probes 5 and 6, provides an indication of when the ice bank reaches a high level requiring the deactivation of the refrigeration system. The probes 5-8 are therefore only a “single sensor unit” that provides an indication of ice bank thickness at one location. Applicant accordingly respectfully submits Chesnut does not

anticipate claims 15-18, 20-22, and 28 as amended because the probes 5-8 are only one sensor unit positioned at one location and thus do not read on Applicant's claimed invention of monitoring sensor units positioned at different locations about the frozen cooling fluid bank.

Claims 19 and 23-27 have not been rewritten in independent form based upon the considered allowability of claim 15 as amended.

The prior art made of record has been reviewed by Applicant and is deemed not to anticipate nor render obvious the claimed invention.

In view of the foregoing, Applicant respectfully requests reconsideration of the rejected claims and consideration of the new claims. Applicant further earnestly solicits early allowance of the application.

Respectfully submitted,

LAW OFFICES OF CHRISTOPHER L. MAKAY
1634 Milam Building
115 East Travis Street
San Antonio, Texas 78205
(210) 472-3535

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BY:


Christopher L. Makay
Reg. No. 34,475

ATTORNEY FOR APPLICANT

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Christopher L. Makay